

LISA L. RUSSELL, Deputy Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

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Counsel for Federal Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

V.

WALTER CRUICKSHANK, in his official capacity as Acting Secretary of the Interior,¹ et al.,

Federal Defendants

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

Case No. 2:24-cv-05459-MWC-
MAA

REQUEST FOR LEAVE TO APPEAR AT HEARING REMOTELY

Honorable Michelle Williams
Court
United States District Judge

¹ Under Federal Rule of Civil Procedure 25(d), Mr. Cruickshanks is automatically substituted for Debra Haaland, formerly Secretary of the Interior.

1 Federal Defendants respectfully request leave for counsel to appear remotely
2 at the hearing on Plaintiffs' pending Motion for Leave to File First Supplemental
3 and Amended Complaint, which is noticed for February 7, 2025, at 1:30 p.m. ECF
4 No. 38 at i. In support of this request, Federal Defendants state as follows:

5 Federal Defendants have taken no position on Plaintiffs' motion, ECF No.
6 41 at 1, and do not intend to offer argument at the hearing, Decl. of Daniel C.
7 Luecke in Support of Application to Appear Remotely ¶ 3, ECF No. 45-1. Counsel
8 for Federal Defendants is located in Washington, D.C. *Id.* at ¶ 5. Consequently,
9 because it would conserve significant resources without negatively impacting the
10 proceedings, there is good cause to grant Federal Defendants' request for leave to
11 appear at the hearing remotely.

12 Counsel for Federal Defendants corresponded with counsel for Plaintiffs and
13 Intervenor-Defendant regarding this request on January 27, 2025. *Id.* at ¶ 6. None
14 of the other parties oppose this request. *Id.*

15 For these reasons, Federal Defendants respectfully request that the Court
16 grant this request.

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19 Dated: January 30, 2025

LISA L. RUSSELL,
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22 /s/ Daniel C. Luecke
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